

Dear FCC,

I wish to support the intentions of the petitioner as described in this petition.

The code is now an unnecessary part of determining the competence of a person seeking to participate in the Amateur Radio Service under Part 97. Competence in the technical arena is far more important.

This service suffers from a number of problems. While it is a hobby, there are a number of licensed operators that have been in this service for many years and there most cherished operating activity is participation in voice networking. These networks do many things for many people and some are more important than others. Here technical competence, operator skill, and good behavior serve the needs of those engaged in this activity.

Many thousands of contacts each day occur using only voice emission types. Again only technical competence and operator skill insures successful completion of a contact and many more have this requirement when digital modes other than using Morse coded transmissions are considered.

Can code testing eliminate potentially bad operators? I think not. On the other hand, meeting the requirements for this qualification can easily be shown to discourage otherwise technically competent individuals from pursuing an Amateur License.

Should competence with receiving signals coded in the Morse Code be retained. I think not. You previously stated that the testing requirement was only being retained because it was required by ITU regulation. This stumbling block is now history and many administrations have opted to delete this requirement of their licensees. While following the herd is not always good, in this case it does make sense because it will make testing of high quality candidates less expensive and more easily administered. You must agree that this part of the testing is the most difficult to provide for and administer.

There should always be a place for Morse coded transmissions to be utilized. Those of us that use this mode regularly will always retain the skills we have learned and I know people that will gladly learn the needed skills without mandating them. I for one must use this mode because I am engaged in developing and testing simple systems that generate signal levels of less than 5.0 Watts output. I have made one (1) contact using 125mW that covered ~800 miles on 10.113 Mhz. These reasons are not sufficient to justify retaining testing for this competency.

In conclusion, there is no real reason for retaining testing for competency in the use of Morse coded emissions. The barrier to eliminating this expensive and unnecessary testing has been eliminated and you should now follow your own reasoning on this issue and grant the petitioners request.